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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 * * *

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 vs.
15 TRAVIUNTA WOODS,
16 Defendant.

2:12-cr-00187-KJD-PAL

UNOPPOSED EXPEDITED MOTION
TO TEMPORARILY MODIFY
CONDITIONS OF PRETRIAL RELEASE
TO ALLOW TRAVEL

17
18 CERTIFICATION: This Motion is timely filed.

19 COMES NOW, the Defendant Traviunta Woods, by and through his attorney of
20 record, Rachel Korenblat, Assistant Federal Public Defender, and hereby moves pursuant to 18
21 U.S.C. § 3145(a)(2) to temporarily modify his conditions of pretrial release to allow Mr. Woods to
22 take his son to Disneyland in Anaheim, California next weekend, the weekend of June 21st. This
23 motion is based on all prior proceedings had herein and the attached memorandum of points and
24 authorities.

25 DATED this 14th day of June, 2013.

26 RENE L. VALLADARES
Federal Public Defender

27 /s/Rachel Korenblat

28 By: _____
RACHEL KORENBLAT
Assistant Federal Public Defender

1 **FACTS**

2 On May 11, 2012, the Magistrate Court released Traviunta Woods on a Personal
3 Recognizance Bond with Pretrial Release Conditions, which included the conditions that he submit
4 to location monitoring and that he remain in Clark County, Nevada. (CR # 4 at p.2.) Thus, for over
5 a year, Mr. Woods has been monitored by Pretrial Services in the form of Passive Global Position
6 Satellite ("GPS") within Clark County.

7 Mr. Wood's Pretrial Services Officer, Justin Mounts, has informed the undersigned
8 that Mr. Woods has been compliant with this location monitoring and all other aspects of his Pretrial
9 Release. Mr. Woods, a single father, wishes to take his son to Disneyland in Anaheim, California
10 for the weekend. Mr. Woods would drive from Las Vegas to Disneyland on Friday, June 21st and
11 he would return to Las Vegas by Sunday evening, June 23rd. Mr. Mounts and AUSA Phillip Smith
12 do not oppose this request. Mr. Woods is not requesting modification of any other release
13 conditions.

14 **CONCLUSION**

15 For the aforementioned reasons, Mr. Woods respectfully requests that this Court
16 grant this motion to allow him to travel to Anaheim, California to take his son to Disneyland.

17 Respectfully submitted this 14th day of June, 2013.

18 RENE L. VALLADARES
19 Federal Public Defender

20 */s/Rachel Korenblat*
By: _____
21 RACHEL KORENBLAT
22 Assistant Federal Public Defender
Counsel for Defendant Woods

23 **IT IS SO ORDERED.**

24 
25 _____
26 **UNITED STATES MAGISTRATE JUDGE**
27 **DATED:** June 14, 2013
28 _____

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 14, 2013, she served an electronic copy of the above and foregoing **UNOPPOSED EXPEDITED MOTION TO TEMPORARILY MODIFY CONDITIONS OF PRETRIAL RELEASE TO ALLOW TRAVEL**, by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
PHILLIP SMITH
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/s/ Karen Brokaw

Employee of the Federal Public Defender